

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

DEXTER WELCH)	Civil Action No. 3:24-CV-00422
)	
Plaintiff,)	Judge: Waverly D. Crenshaw, Jr.
)	Magistrate Judge: Barbara D. Holmes
v.)	
)	JURY DEMAND
UNITED NETWORK FOR ORGAN)	
SHARING; and VANDERBILT)	
UNIVERSITY MEDICAL CENTER,)	
)	
Defendants.)	

**DECLARATION OF MATTHEW L. VENEZIA IN SUPPORT OF PLAINTIFF'S
MOTION FOR RECONSIDERATION OF ORDER ON SUMMARY JUDGMENT**

I, Matthew L. Venezia, declare and state as follows:

1. I am an attorney at law, specially admitted Pro Hac Vice to practice before this Court and duly admitted to practice before all courts of the State of California. I am a partner with Ellis George LLP, counsel of record for Plaintiff Dexter Welch ("Plaintiff" or "Mr. Welch") in this matter. I have firsthand, personal knowledge of the facts set forth below and if called as a witness could and would competently testify thereto.

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2. Pursuant to Local Rule 7.01(a)(1), I met and conferred with counsel for Defendants via videoconference on February 20, 2025 to ascertain whether they would oppose Plaintiff's Motion for Reconsideration of the Court's Order on Summary Judgment. Defendants' counsel informed me Defendants planned to oppose the motion.

Executed February 21, 2025, at Los Angeles, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

s/ Matthew L. Venezia

Matthew L. Venezia

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 21, 2025 the foregoing **DECLARATION OF MATTHEW L. VENEZIA IN SUPPORT OF PLAINTIFF'S MOTION FOR RECONSIDERATION OF ORDER ON SUMMARY JUDGMENT** has been served via CM/ECF, the Court's electronic case filing system, on all parties and counsel registered with CM/ECF in this action as follows:

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s/ Matthew L. Venezia

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